

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
MIDLAND/ODESSA DIVISION**

REDSTONE LOGICS LLC,

Plaintiff,

v.

APPLE INC.,

Defendant.

NO. 7:25-cv-00183-ADA

**Jury Trial Demanded**

**PARTIES' JOINT MOTION FOR ENTRY  
OF PRIOR CLAIM CONSTRUCTION**

Plaintiff Redstone Logics LLC (“Plaintiff” or “Redstone”) and Defendant Apple Inc. (“Defendant” or “Apple”) (collectively, the “Parties”) have agreed—subject to and conditioned upon the Court’s leave—that additional claim construction briefing and oral argument addressing the disputed terms would not be helpful to the Court or necessary in view of the record in a previous case involving the same asserted patent and disputed claim terms, U.S. Patent No. 8,549,339 (the “’339 patent”). *See Redstone Logics LLC v. Qualcomm Inc. et al.*, No. 7:24-cv-00231-ADA (the “Qualcomm Case”). The Parties have agreed to rely upon applicable portions of the briefing, related declarations, exhibits, and attachments, preliminary constructions, hearing transcripts, and the Court’s October 15, 2025, claim construction order and memorandum from the Qualcomm Case involving the ’339 patent for the following disputed terms:

<b>Claim Term in U.S. Patent No. 8,549,339</b>	<b>Court’s Construction in Qualcomm Case</b>
“the first clock signal is independent from the second clock signal” (claims 1, 21)	Plain and ordinary meaning, wherein the plain and ordinary meaning does not require that the first and second clock signals depend from different reference oscillator clocks
“located in a common region that is substantially central to the first set of processor cores and the second set of processor cores” (claim 14)	Indefinite

The Parties thus request that applicable portions of the claim construction proceedings be entered into the record of this case so that each Party may preserve its full appellate rights with respect to these disputed claim terms. The Parties have attached to this Joint Motion copies of the documents to be incorporated into this case from the Qualcomm Case to ensure they are part of the record for appeal. Specifically, the Parties attach the briefing located at ECF Nos. 27-30 and 32, related declarations, exhibits, and attachments, preliminary constructions, hearing transcripts at ECF No. 34, and the Court's October 15, 2025, claim construction order and memorandum at ECF No. 43. For avoidance of doubt, the Parties maintain their disputes as to these terms, but rest upon the previous claim construction record as to those terms. The Parties each agree not to contend that this Joint Motion and/or entry of relevant portions of the Qualcomm Case's claim construction record constitutes a waiver, forfeiture, or lack of preservation of any right to appeal, or any argument regarding, the claim construction order ultimately entered in this case.

The Parties thus request that the Court (1) adopt the portion of the claim construction record in the Qualcomm Case (including the attached briefing, related declarations, exhibits, preliminary constructions, hearing transcripts, and the Court's October 15, 2025, claim construction order and memorandum) insofar as each relates to the disputed terms; (2) issue its claim constructions for these identified terms consistent with the constructions from the Qualcomm Case, and (3) enter the Parties' agreed-upon construction for the term "a first/second set of processor cores" (claims 1, 21). Each Party retains the right to appeal any otherwise-appealable construction entered by the Court in this action.

In the event of any appeal, the Parties stipulate to include copies of the attached briefing, related declarations, exhibits, preliminary constructions, hearing transcripts, and the Court's October 15, 2025, claim construction order and memorandum in the appellate records as if litigated

in the present case. Indeed, the Parties have agreed to forego the January 26, 2026, *Markman* hearing without waiving their substantive positions or the right to appeal any otherwise-appealable construction entered by the Court in this action. Consistent with that agreement, the Parties request that the Court vacate the January 26, 2026, *Markman* hearing and preceding claim construction briefing deadlines, which the Parties agree will not affect any other deadlines in this action.

For the foregoing reasons, the Parties believe there is good cause for the Court to grant the Parties' Joint Motion.

Dated: October 31, 2025

/s/ Reza Mirzaie (with permission)

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***Counsel for Defendant Apple Inc.***

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on October 31, 2025, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Shaelyn Dawson  
Shaelyn Dawson

**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that all counsel of record have met and conferred in accordance with Local Rule CV-7(h) and this joint motion is unopposed.

/s/ Shaelyn Dawson  
Shaelyn Dawson